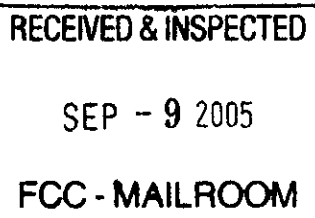


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September 02, 2005

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Comments In the Matter of:

Amendment of Part 97 of the Commission's Rules
to Implement WRC-03 Regulations Applicable to
Requirements for Operator Licences in the Amateur Radio Service.

And reference to FCC05-143 and Docket 05-235

It is unfortunate that none of the FCC commissioners nor the chairman have any communications skills or experience whatever. It seems likely that these commissioners will, once again, be lead to a wrong decision much as they were to allowing the 11 meter band (circa 1958) to be assigned to a Citizen's Band. History seems now, to be on the verge of repeating itself in another significantly bad FCC rule making.

First, I can say that the ARRL, of which I am a member, is not representative of its membership. During meetings of the ARRL local chapter, I have seen a 99% vote to retain the Morse code later reported by attending ARRL staff as "less than half". The ARRL has management that has a great interest in seeing the numbers of Amateur Radio Operators expanded with no regard to the loss of a quality service. The interest would seem to be primarily pecuniary.

Internationally, other nations have eliminated the Morse code requirement and it is likely that the FCC commissioners will, once again, follow those leaders. Rather than lead other nations, which the FCC did historically, the present FCC is more likely to follow.

Statements that digital forms of communications have replaced and eliminated the need for Morse code are great exaggerations. Specifically, petitioners have cited our great array of satellites to be adequate to all of our communications needs. It should be noted by the Commissioners that the entire assortment of satellites could be eliminated in a fell swoop by a series of coronal mass ejaculations from our sun. No, it has not yet happened. The levees about the city of New Orleans were said to be adequate as well.

The Morse code is a fundamental to understanding radio communications. Eliminating the requirement will disadvantage future Amateur Radio operators in their technical understanding of communications.

The Morse code is a device that can break through interference (whether from storms or man-made) at times when no other service will provide communications. Further,

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Amateur Radio operators can use it with small amounts of power fully independent of electrical infrastructure (household wiring), when necessary.


Eliminating the Morse code requirement will:

1. Reduce significantly the comprehension of radio as a technical subject by future licensees.
2. Reduce this nation's ability to communicate if and when serious circumstances such as natural disasters, enemy attack, or power grid overload reduce the effectiveness of conventional equipment.
3. Further reduce the quality of amateur operators and open the amateur radio bands to persons with a good deal less dedication to experimentation and to public service. In short, the Amateur Radio Service will become a good deal more like the Citizens Band service, which I would remind the commissioners, spiraled completely out of control and is now radio-anarchy, rather than a useful communications tool. Inexperience on the part of FCC Commissioners lead to the terrible choice of the 11 meter band.

This writer, an Amateur Radio Operator, requests that the Morse Code requirement be retained for at least the top (Extra) class of Amateur Radio license and at a speed of at least ten (10) words per minute.

It would be a very serious mistake to eliminate a code requirement entirely as doing so will deprive this nation of a quality body of communications experts that cannot be deterred or stopped by natural disaster, power grid systems failure or enemy attack.

Will the Federal Communications Commission be one more body that follows the lead of other nations, or will we see the commissioners realize the significant value to our nation's safety? Will you lead or will you follow?



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